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Application No. : 09/470,875 Confirmation No. 6722
Applicant : Manpreet S. KHAIRA
Filed : December 22, 1999
Title : METHOD AND APPARATUS FOR PERFORMING DISTRIBUTED
SIMULATION UTILIZING A SIMULATION BACKPLANE
TC/A.U. : 2123
Examiner : Dwin M. Craig
PAPER(s) ENTITLED: Reply Brief 5 pages
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Patent

Attorney Docket No.: Intel 2207/6843

Serial No.: 09/470,875

Assignee: Intel Corporation

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application No. : 09/470,875

Confirmation No. 6722

Applicant : Manpreet S. KHAIRA

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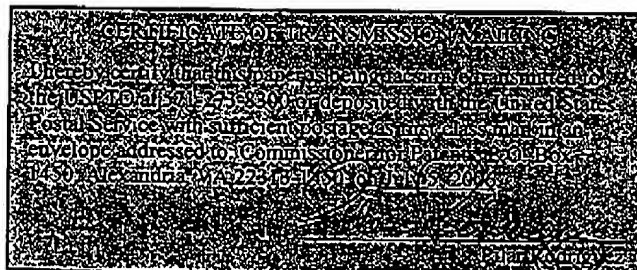
Title : METHOD AND APPARATUS FOR PERFORMING DISTRIBUTED
SIMULATION UTILIZING A SIMULATION BACKPLANE

TC/A.U. : 2123

Examiner : Dwin M. Craig

Customer No.: : 25693

M/S Appeal Briefs - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Dear Sir:

This Reply Brief is submitted in response to the Examiner's Answer mailed in this case on May 4, 2006.

Appellant submits this Reply Brief to address issues raised in the Examiner's Answer.

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REMARKS

Applicant submits the arguments in the Examiner's Answer (dated 5/4/2006) fails to support a proper rejection for at least the following reasons.

First, the Examiner asserts Eisenhofer-1 teaches data conversion taking place "at the boundary between the simulator modules interface(s) and the simulation backplane", citing previously discussed cited section column 12, lines 39-41. *See Answer*, page 10. However, as previously argued, the cited section does not discuss a "boundary" or the simulation module interfaces at all; rather, the section discusses the use of the simulation backplane 210, and *only* the simulation backplane 210 to convert the messages. The Examiner's assertions are unsupported by the reference.

Next, the Examiner cites column 12, lines 45-49. Applicant maintains the arguments of the Appeal Brief, wherein Applicant stated the cited sections did not teach the relevant arguments. The cited section states:

Therefore, before transferring the signal state from the source simulator to one or more target simulators, signal mapping (also referred to as data type conversion) is performed between the source and target representations in order to achieve consistent signal state representations.

The cited section discusses signal mapping/data type conversion before transfer to one or more target simulators. The cited section does not discuss which element actually performs the conversion (however, one would presume it is the simulation backplane 210, discussed above). Regardless, the cited section does describe operating an *interface* to convert messages as specifically described in embodiments of the present application. Merely citing to a section describing data type conversion is inadequate to support a proper §103(a) rejection of the embodiments of the present application.

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The Examiner also cites column 12, lines 54-60. Again, Applicant maintains these sections do not describe the relevant limitations. The cited section states:

Mapping to intermediate simulation backplane types involves mapping from a data type associated with the source simulator to an intermediate abstract type associated with the simulation backplane 210 followed by a mapping from the intermediate abstract type to a data type associated with the target simulator.

The cited section merely describes “mapping” generally, in that it involves mapping between two different data types; the first is associated with a simulator and the second with a simulation backplane. Indeed, the cited section does not refer to an interface at all, much less describing the use of an interface to convert messages. This section is inadequate to support a proper rejection as well.

The Examiner alleges previously cited column 5, lines 54-60 of Eisenhofer-1 teaches the relevant limitations. However, as discussed in the Appeal Brief, column 5, line 66 – column 6, line 5 and column 6, lines 15-19 serve to clarify that it is the simulation backplane 210 that is actually “convert[ing] the event information to a representation usable by the target simulator”. Specifically, for example, column 6, lines 15-19 state:

When a boundary event occurs between simulators, *the simulation backplane 210 synchronizes the simulators so that they are at the same point in time and, before transferring any event information, it converts the event information to a representation usable by the target simulator. (emphasis added)*

Therefore, regardless of the vague “interface routines” allegedly directed toward data type conversions contributed by the simulator interfaces 241-244 (column 5, line 60), the Eisenhofer-1 does not utilize these interfaces to perform the *actual conversion*. That function, as shown by the multiple sections of Eisenhofer-1 argued herein and the Appeal Brief, is done by the simulation backplane 210. Embodiments of the present application specifically describe operating *interfaces to convert messages* between data format associated between a data format

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associated with a fixed configuration backplane and a data format associated with a simulator.

This is not described in the Eisenhower-1 reference, or any of the other cited references.

The Examiner further cites to column 11, lines 49-59 of Eisenhower-2 as describing the relevant limitations. Applicant disagrees. The cited section states:

After any necessary data type conversion has been performed the boundary event information may be transferred. The communication channel, the mechanism used to gather and transfer boundary event information, varies from one simulator to another. For example, the transfer may occur through direct memory transfer (e.g., subroutine or shared memory implementation), or through inter-process communication. In any event, after the source and target simulators have been synchronized and the boundary event information has been transferred, simulation processing continues at step 630.

The cited section is directed toward events after data type conversion has occurred (i.e., transfer of boundary event information). It describes the operation of the communication channel in these post-data conversion, boundary event information transfer operations. Specifically, it describes the preconditions for simulation processing: a) synchronizing of simulators and b) transfer of boundary event information. In sum, this section is not directed toward data conversion at all. Moreover, it certainly does not describe operating *interfaces to convert messages* between data format associated between a data format associated with a fixed configuration backplane and a data format associated with a simulator.

In light of at least the arguments made above and those found in the Appeal Brief, Applicant submits the Examiner's assertion is incorrect and unsupported by the cited reference. Therefore, for at least these reasons, the Claims 1-56 are believed to be patentable over the cited references, individually and in combination. Withdrawal of the rejections is, therefore, respectfully requested.

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Appellant therefore respectfully requests that the Board of Patent Appeals and Interferences reverse the Examiner's decision rejecting claims 1-18 and direct the Examiner to pass the case to issue.

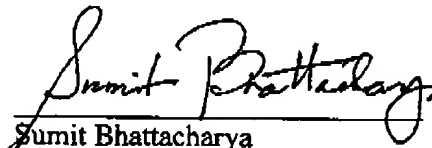
The Examiner is hereby authorized to charge any additional fees which may be necessary for consideration of this paper to Kenyon & Kenyon Deposit Account No. 11-0600.

Respectfully submitted,

KENYON & KENYON LLP

Date: July 5, 2006

By:


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